

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

GERALD ROBINSON

Plaintiff,

v.

TARGET STORES, INC. and
TARGET CORPORATION

Defendants.

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CIVIL ACTION NO. 4:18-cv-00316

JURY

AGREED STIPULATION OF DISMISSAL WITH PREJUDICE

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW, **Plaintiff, GERALD ROBINSON** and **Defendant TARGET CORPORATION** (*also incorrectly identified as Target Stores, Inc.*), and files this Agreed Stipulation of Dismissal with Prejudice and respectfully state as follows:

I.

Plaintiff and Defendant have reached a compromise settlement of the matters being litigated in this case. Pursuant to that settlement agreement, the parties agree to the dismissal of Plaintiff's claims in this suit. Defendant agrees to the dismissal.

II.

Plaintiff and Defendant have agreed to bear their own attorney fees and costs.

III.

This case is not a class action; a receiver has not been appointed in this action; this case is not governed by any federal statute that requires an order of the court for dismissal of the case.

IV.

Plaintiff and Defendant have not previously dismissed any federal or state court action based on or including the same claims as those presented in this suit.

V.

This dismissal is with prejudice to the refiling of the same claims.

WHEREFORE, the parties, **GERALD ROBINSON** and **TARGET CORPORATION**, request this Honorable Court enter an order dismissing the claims in this suit against Defendant with prejudice, with the parties bearing their own attorney's fees and costs.

Respectfully submitted,

THE VILLACORTA LAW FIRM, P.C.

By: /s/ Adrian V. Villacorta, by permission

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-AND-

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**ATTORNEYS FOR PLAINTIFF,
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**ATTORNEYS FOR DEFENDANT,
TARGET CORPORATION**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been duly sent via CM/ECF on August 14, 2019 to all counsel of record, as follows:

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